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TROUTMAN PEPPER HAMILTON SANDERS LLP
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Atlanta, GA 30308 (*Corporate Office*)

Attorneys for Nationstar Mortgage LLC d/b/a Mr. Cooper

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

PRESIDIO MANAGEMENT LLC SERIES 2,
a Nevada limited liability company,

Plaintiff,

v.

NATIONSTAR MORTGAGE, LLC d/b/a MR.
COOPER; QUALITY LOAN SERVICE
CORPORATION; DOE individuals I through
XX; ROE CORPORATIONS I through XX
INCLUSIVE,

Defendants.

Case No. 2:22-cv-00393-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND**

Plaintiff, Presidio Management LLC Series 2 (“Presidio”) and Defendant, Nationstar Mortgage, LLC d/b/a Mr. Cooper (“Nationstar”) (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree to extend the date for Nationstar to file a Reply in Support of its Motion to Dismiss (“Reply”).

In support of the stipulation, the Parties state as follows:

1. On February 10, 2022, Presidio filed the Complaint in the instant matter.
2. On February 14, 2022, the Complaint was served to Nationstar.
3. On March 2, 2022, Nationstar filed a Removal to Federal Court based on diversity of jurisdiction.
4. On March 14, 2022, the Parties filed a Stipulation and Order to the following items:

to extend time for Nationstar to file its responsive pleading to the Complaint; for Plaintiff to amend the Complaint to name Fannie Mae as a defendant in this matter; and to postpone the Trustee's Sale for the subject property located at: 510 Rafkin Place, Henderson, NV 89052 (APN: 177-25-516-006).

5. Nationstar filed a Motion to Dismiss on April 13, 2022.

6. Plaintiff filed its Opposition to Nationstar's Motion to Dismiss on May 16, 2022.

7. The Parties agree Nationstar shall have until June 6, 2022, to file its Reply in Support of its Motion to Dismiss.

8. Both parties represent this stipulation is not made with any intent to delay or prejudice either party.

IT IS SO STIPULATED.

DATED this 23rd day of May, 2022.

Troutman Pepper Hamilton Sanders LLP

/s/ Vanessa M. Turley

Vanessa M. Turley, Esq.

Nevada Bar No. 14635

8985 S. Eastern Avenue, Suite 200

Las Vegas, NV 89123

Counsel for Nationstar Mortgage, LLC

DATED this 23rd day of May, 2022.

CLARK NEWBERRY LAW FIRM

/s/ Aimee Clark Newberry (w/consent)

Aimee Clark Newberry, Esq.

Nevada Bar No. 11084

410 S. Rampart Blvd, Suite #390,


Las Vegas, NV 89145

Counsel for Collegium Fund LLC Series #24

ORDER

IT IS HEREBY ORDERED that Nationstar shall have until June 6, 2022, to file its Reply in Support of its Motion to Dismiss.

The Court, having found good cause and excusable neglect, **IT IS SO ORDERED.**


UNITED STATES DISTRICT JUDGE

DATED: May 27, 2022

SUBMITTED BY:

Troutman Pepper Hamilton Sanders LLP

/s/ Vanessa M. Turley
Vanessa M. Turley, Esq.
Nevada Bar No. 14635
8985 S. Eastern Avenue, Suite 200
Las Vegas, NV 89123

Counsel for Nationstar Mortgage, LLC

Archived: Monday, May 23, 2022 3:56:20 PM

From: [Turley, Vanessa M.](#)

Mail received time: Mon, 23 May 2022 13:03:45

Sent: Mon, 23 May 2022 17:03:43

To: [Kusch, Janet Owen](#)

Subject: *Please File* Palo (24 Sablewood Cir) & Hernandez (2184 Eagle Watch Dr)- Replies in Support of MTS

Importance: Normal

Sensitivity: None

Hi Can you please file? Authorization for e-signature below.

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Aimee Clark Newberry <aclarknewberry@cnlawlv.com>

Sent: Monday, May 23, 2022 12:59 PM

To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Cc: Kusch, Janet Owen <Janet.Kusch@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>; Kathy Seckinger <KSeckinger@cnlawlv.com>

Subject: RE: Palo (24 Sablewood Cir) & Hernandez (2184 Eagle Watch Dr)- Replies in Support of MTS

EXTERNAL SENDER

You may add my electronic signature to the stips.

Thanks.

Aimee

Aimee Clark Newberry, Esq.

Clark Newberry Law Firm

410 S. Rampart Blvd., Suite 390

Las Vegas, NV 89145

Office- (702) 608-4232

Cell- (702) 816-0321

aclarknewberry@cnlawlv.com

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Sent: Monday, May 23, 2022 9:57 AM

To: Aimee Clark Newberry <aclarknewberry@cnlawlv.com>

Cc: Kusch, Janet Owen <Janet.Kusch@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>

Subject: RE: Palo (24 Sablewood Cir) & Hernandez (2184 Eagle Watch Dr)- Replies in Support of MTS

Here you go! Sorry about that.

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Aimee Clark Newberry <aclarknewberry@cnlawlv.com>

Sent: Monday, May 23, 2022 12:54 PM

To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Cc: Kusch, Janet Owen <Janet.Kusch@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>

Subject: RE: Palo (24 Sablewood Cir) & Hernandez (2184 Eagle Watch Dr)- Replies in Support of MTS

EXTERNAL SENDER

The text of both is Collegium 24. The substance is fine, but can you please send back to me with the corrected party info?

Thanks.

Aimee

Aimee Clark Newberry, Esq.

Clark Newberry Law Firm

410 S. Rampart Blvd., Suite 390

Las Vegas, NV 89145

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Cell- (702) 816-0321

aclarknewberry@cnlawlv.com

From: Turley, Vanessa M. <Vanessa.Turley@troutman.com>

Sent: Sunday, May 22, 2022 5:38 PM

To: Aimee Clark Newberry <aclarknewberry@cnlawlv.com>

Cc: Kusch, Janet Owen <Janet.Kusch@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>

Subject: RE: Palo (24 Sablewood Cir) & Hernandez (2184 Eagle Watch Dr)- Replies in Support of MTS

Hi Aimee,

Here are the Stipulations. Please let me know if you have revisions or if I can use your e-signature.

Thanks,

Vanessa M. Turley

Attorney

troutman pepper

Direct: 470.832.5572

vanessa.turley@troutman.com

From: Aimee Clark Newberry <aclarknewberry@cnlawlv.com>
Sent: Saturday, May 21, 2022 4:06 PM
To: Turley, Vanessa M. <Vanessa.Turley@troutman.com>
Cc: Kusch, Janet Owen <Janet.Kusch@troutman.com>; Streible, Elizabeth M. <Elizabeth.Streible@troutman.com>
Subject: Re: Palo (24 Sablewood Cir) & Hernandez (2184 Eagle Watch Dr)- Replies in Support of MTS

EXTERNAL SENDER

That works for us.

Do you want to prepare the SAOs or do you want us to?

Aimee

Sent from my iPhone

On May 21, 2022, at 12:54 PM, Turley, Vanessa M. <Vanessa.Turley@troutman.com> wrote:



Hi Aimee,

I hope all is going well on your end. I see that you had filed your Oppositions to the Motions to Dismiss in Pao & Hernandez. Could you please grant me a 14-day extension to get our replies on file? If you are agreeable our Replies will be due on June 6th and I can circulate a stipulation and order.

Thank you,

Vanessa M. Turley

Attorney

Direct: 470.832.5572

vanessa.turley@troutman.com

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